## REMARKS

### I.  INTRODUCTION

Claims 1, 2, and 11 have been amended. Support for these amendments can be found at least at ¶¶ [0008]-[0009] and [0031] of the published application. Thus, claims 1-19 remain pending in the present application. No new matter has been entered. In light of the above amendments and the following remarks, Applicant respectfully submits that all presently pending claims are in condition for allowance.

### II.  35 U.S.C. § 103(a) REJECTIONS SHOULD BE WITHDRAWN

Claim 1 stands rejected under 35 U.S.C. § 103(a) for being obvious over "HART, Field Communication Protocol, Application Guide" ("the Guide") in view of Andreas et al. (U.S. Patent No. 6,928,501) and further in view of Brooke (U.S. Patent No. 5,909,591).

Claim 1 has been amended to recite "determining a respective unique address for each of the plurality of slave devices; and transmitting a further HART command "Write polling address" from the master device to each slave device of the plurality of slave devices over the two-wire line with the respective unique address determined for the respective slave device, wherein the respective slave device is addressed by the respective unique identifier, the further HART command is preprogrammed to change the identical address for the respective slave devices to the respective unique address for each respective slave device."

The Examiner states that the arguments made in the previous response (See 12/11/08 Response, p. 7, ¶¶ 2 and 3) were not supported by the claims. Applicant respectfully submits that these arguments are now supported by the amendments made to the claims.

As conceded by the Examiner, The Guide does not disclose transmitting the HART command as a broadcast command such that each of the slaves obtains an

identical address not equal to zero, which is changed to a unique address for each slave device. In order to cure the deficiencies of the Guide and Brooke, the Examiner relies on Andreas. However, Andreas discloses a serial device daisy chaining method, which means that the slaves (clients) are coupled to each other in a serial manner. Andreas discloses that "[t]he devices are "daisy-chained" such that the SDI input for any serial device is provided by the SDI THRU output of a preceding device in the chain, with the exception of the first device 220 in the chain which receives its SDI signal from the SDO of the bus master 210." (*See* Andreas, col. 3, ll. 32-42). So, only the first client gets serial data directly from the master (server). This client then relays this data to the next client, and so forth. This aspect of the Andreas disclosure does not meet the limitations of claim 1 because claim 1 relates to a method in which all clients are addressed by the server at the same time in a parallel manner, i.e. in a *broadcast* mode. Accordingly, Andreas fails to disclose or suggest.

Furthermore, Andreas teaches that after a first channel identifier is transmitted from the server to the client, the identifier is then compared with an internal identifier by that particular client. Andreas explains that "[t]he CID is modified as it cascades through the daisy chain. This permits all serial devices to compare their respective received CIDs with the same pre-determined value." (*Id.*, col. 4, ll. 3-5). Thus, if the first channel identifier is not similar to the internal identifier, the first channel identifier is changed by that particular client, i.e. decremented. The decremented first channel identifier is then transmitted to the next client of the daisy chain, where it is compared to the same internal identifier. Again, if the internal identifier is different from the decremented first channel identifier, it is further decremented and transmitted to the next client, and so forth. In contrast to this teaching, according to the claimed invention, the slaves do not change a value transmitted from the server and do not transmit it to other clients. Accordingly, Andreas fails to disclose or suggest "*transmitting a HART command 'Write polling address' as a broadcast command from the master device to the plurality of slave devices over the two-wire line with a polling address not equal to zero, the HART command being preprogrammed to cause the slave devices to (i) automatically switch to a multidrop mode and (ii) obtain an identical address not equal to zero.*"

Applicant respectfully submits that the Guide, Andreas, and Brooke, taken alone or in any combination, fail to teach *"transmitting a HART command 'Write polling address' as a broadcast command from the master device to the plurality of slave devices over the two-wire line with a polling address not equal to zero, the HART command being preprogrammed to cause the slave devices to (i) automatically switch to a multidrop mode and (ii) obtain an identical address not equal to zero,"* as recited in claim 1. Thus, it is respectfully submitted that claim 1 is allowable.

Claims 2 - 19 stand rejected under 35 U.S.C. 103(a) as obvious over The Guide in view of *"*About HART: Part 1*"*("About HART"), in further view of Andreas, and further in view of Brooke.

Claim 2 recites limitations substantially similar to those of claim 1, including *"transmitting a HART command "Write polling address" as a broadcast command from the master device to the plurality of slave devices over the two-wire line with a polling address not equal to zero, the HART command being preprogramed to cause the slave devices connected to the master device to (i) automatically switch to a multidrop mode and (ii) obtain an identical address not equal to zero."*

For at least the same reasons as discussed above in regard to claim 1, it is respectfully submitted that claim 2 is not rendered obvious by The Guide, About HART, Andreas and Brooke, taken alone or in any combination, and that the rejection of this claim should be withdrawn. Because claims 3 - 10 depend from and include all of the limitations of claim 2, it is respectfully submitted that these claims are also allowable.

Claim 11 recites limitation substantially similar to those of claims 1 and 2. Thus, for at least the same reasons as described above with regard to claim 1, it is respectfully submitted that claim 11 is not rendered obvious by The Guide, About HART, Andreas and Brooke, taken alone or in any combination, and that the rejection of this claim should

be withdrawn. Because claims 12 - 19 depend from and include all of the limitations of claim 11, it is respectfully submitted that these claims are also allowable.

## CONCLUSION

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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